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UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13 : Angelo Irizarry, Jr. and Katherine A. Klein : BANKRUPTCY NO.: 23-11781

RESPONSE TO THE MOTION TO REOPEN

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Denied. The personal injury claim was filed for the benefit of Katherine A. Klein's father who deceased prior to the filing of the instant Chapter 7 Bankruptcy matter.
- 6. Admitted.
- 7. Denied. This case does not involve any "Texas property."
- 8. Admitted.

WHEREFORE, based on the aforementioned, the Debtors do not oppose an Order reopening the instant Bankruptcy matter.

Dated: March 30, 2024

/s/Brad J. Sadek, Esquire Brad J. Sadek, Esquire Sadek Law Offices, LLC 1500 JFK Boulevard, #220 Philadelphia, PA 19102